

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON  
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC d/b/a  
NORTHSTAR COMMERCIAL  
PARTNERS, et al,

Defendants.

CASE NO. 1:20-cv-484-LO-TCB

800 HOYT LLC,

Intervening Interpleader Plaintiff,

v.

BRIAN WATSON, WDC HOLDINGS,  
LLC, PLW CAPITAL I, LLC, BW  
HOLDINGS, LLC, AMAZON.COM, INC,  
and AMAZON DATA SERVICES, INC.

Interpleader Defendants.

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL AND WITHDRAWAL OF  
ANSWER FILED ON BEHALF OF PLW CAPITAL I, LLC**

Pursuant to Local Civil Rule 83.1, the undersigned, Jeffrey R. Hamlin, and his colleagues George R. Calhoun, James M. Trusty, Stanley L. Garnett, and Amanda K. Houseal respectfully move this Court for leave to withdraw as counsel of record for PLW Capital I, LLC (“PLW Capital”) and to withdraw the Answer filed on behalf of PLW Capital.

In late-September 2021, 800 Hoyt, LLC (“800 Hoyt”) filed a motion to intervene, Dkt. 334, which the Court granted on October 18, 2021, Dkt. 382. That same day, 800 Hoyt filed its Substitute Proposed Interpleader Complaint, Dkt. 383, naming as Defendants Brian Watson, WDC Holdings, LLC (“Northstar”), PLW Capital I, LLC, BW Holdings, LLC, Amazon.com, Inc. and Amazon Data Services, Inc.

On November 12, 2021, the undersigned filed an Answer that purported to speak for Interpleader Defendants Brian Watson, Northstar, PLW Capital, and BW Holdings, LLC. Brian Watson and his ex-wife, Patricia Watson, share equal parts ownership of PLW Capital. Mr. Watson authorized undersigned counsel to file an Answer to the Interpleader Complaint on behalf of PLW Capital to protect its interests. Patricia Watson expressed concern to undersigned counsel that they filed a response on behalf of PLW as she is a 50% owner and claiming PLW Capital is not a party to the case.<sup>1</sup> Ms. Watson has asked us to promptly clarify with the Court that we do not represent her interest in PLW Capital.

In an effort to avoid additional conflict and potential litigation, the undersigned and the attorneys named herein respectfully request leave to withdraw as PLW Capital’s counsel of record and to withdraw the Answer filed on behalf of PLW Capital. The Answer remains as filed for the remaining Interpleader Defendants. A proposed order is being filed herewith.

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<sup>1</sup> Undersigned counsel disagrees with Ms. Watson’s assertion. PLW Capital is certainly a Defendant in this case pursuant to the Interpleader Complaint.

Dated: November 19, 2020

Respectfully submitted,

/s/ Jeffrey R. Hamlin

Jeffrey R. Hamlin (VSB No. 46932)

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*Counsel for Defendants Brian Watson, WDC  
Holdings LLC, and BW Holdings LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 19, 2021, I will file the foregoing **Motion for Leave to Withdraw as Counsel and Withdrawal of Answer Filed on Behalf of PLW Capital I, LLC**, using the Court's ECF/CM filing system, which will send a notification of such filing (NEF) to all counsel of record. For those parties for whom counsel is not known, a true and correct copy of the foregoing document shall be served by U.S. mail to their last known address

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